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Mail Room

February 14, 2011

To: Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

(Original plus four copies)

Federal Communications Commission
Enforcement Bureau
Telecommunications Consumers Division
445 12th Street, SW
Washington, DC 20554

(Two copies)

Best Copy and Printing, Inc.
445 12th Street
Suite CY-B402
Washington, DC 20554

(One copy)

In re: Annual 47 C.F.R. 64.2009(e) CPNI Certification
EB Docket No. 06-36

Attached please see the above-referenced certification for BTC, Inc. for 2010.

Sincerely,

BTC, INC.

Megan Badding
Marketing/Sales/CS Manager

Enclosures

No. of Copies rec'd 0 + 4
List A B C D E

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010.

Date filed: February 14, 2011

Name of company covered by this certification: BTC, Inc.

Form 499 Filer ID: 821922

Name of signatory: Megan Badding

Title of signatory: CSR/Sales/Marketing Manager

I, Megan Badding, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

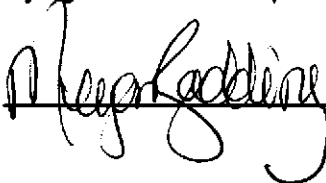
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. See attached accompanying statement of operating procedures.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

Signed: _____

A handwritten signature in black ink, appearing to read "Megan Badding", is written over a horizontal line.

Attachment: Accompanying Statement of Operating Procedures

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, BTC, Inc., herein referenced as the Company hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI file has been updated in order to account for all FCC CPNI rules, including the recent revisions, and has been adopted by our Company.
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
 - a. Established an outbound marketing supervisory review process for the use of CPNI
 - b. Records are maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
 - a. Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
4. Carrier authentication requirements have been met
 - a. All customer during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail)
 - b. Call detail is only released to customers during customer-initiated telephone contact only by the following FCC approved methods for the release of the requested call detail: BTC, Inc. does not use password method.
 - i. Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
 - ii. Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
 - iii. Having customer come in to Company's office and provide a valid government issued photo ID
5. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
 - a. authorized user
 - b. address of record
 - c. customer response to a back-up means of authentication
6. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
7. Opt-out method for approval of CPNI use for marketing campaigns is utilized
 - a. Customers are notified annually of their rights for the use of their CPNI in marketing campaigns
 - b. New customers are notified of the opt-out procedure as a part of the customer sign-up process
 - c. Billing system displays customer's opting status
 - d. Compliance officer retains CPNI notifications and opting records for at least two years
8. Additional protection measures are taken above and beyond the current FCC CPNI rules
 - a. Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
 - b. Company maintains security of all CPNI, including but not limited to:
 - i. Documents containing CPNI are shredded



BTC, Inc.
d/b/a Western Iowa Networks

**Policy and Procedures Governing
Customer Proprietary Network Information**

Introduction

Statement of Company Policy-

Under applicable federal and state laws, BTC, Inc. d/b/a Western Iowa Networks, (the "Company") has a duty to protect the confidentiality and proprietary information of, and relating to, customers, other telecommunication carriers, and equipment manufacturers. To ensure full compliance with these laws and regulations, including, specifically, the rules of the Federal Communications Commission governing customer proprietary network information ("CPNI"), this Manual sets forth in detail the policy and procedures of BTC, Inc., d/b/a Western Iowa Networks governing the use, disclosure, and provision of access to such proprietary information.

Statement of Company Policy

*** Each employee of the Company is required to protect the confidentiality of Customer Proprietary Network Information (CPNI) and, shall comply with all policies and procedures set forth in this Manual.

*** Any violation of or departure from the policies and procedures set forth in this Manual shall be reported to the Company's CPNI Compliance Officer.

*** Any failure to comply with the policies and procedures set forth in this Manual shall result in disciplinary action including, but not limited to, suspension and/or termination of employment.



**The policies and procedures set forth in this manual apply to all Employees,
Officers, and Board Members of
BTC, Inc., d/b/a Western Iowa Networks.**

1. **Definition CPNI-** Customer Proprietary Network Information
 - A. Includes personally identifiable information derived from a customer's relationship with a wireline or wireless telephone company. Every telecommunications carrier has the duty to protect the confidentiality of its customers' CPNI.
 - B. Information contained in the billings pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI includes highly-sensitive personal information such as phone numbers called by a consumer; the frequency, duration, and timing of such calls, and any services purchased by the consumer, such as call waiting.
2. **Account Information-** Account information that is specifically connected to the customer's services relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.
3. **Address of Record-** An address of record whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.
4. **Call Detail Information-** Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, and duration of any call.
5. **Telephone number of record-** The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information"
6. **Valid Photo ID-** A valid photo id is government- issued means of personal identification with photograph such as drivers license, passport, or comparable ID that is not expired.



Confidentiality of CPNI

1. The company may only use, disclose, or permit access to individually identifiable CPNI-
 - a. as required by law
 - b. with the approval of the customer; or
 - c. in providing the telecommunication service from which the CPNI is derived or in providing services necessary to, or used in, providing such telecommunications service.
2. Disclosure upon Request by customers. The company shall disclose CPNI, upon affirmative written request by the customer, to any person designated by the customer.

Conduct Expressly prohibited by the Company

1. The following are expressly prohibited by the Company:
 - a. Sale or possession of CPNI
 - b. Use of CPNI to track customers' use of competitors' services
2. Any violation of this section shall be grounds for immediate termination of employment and, as applicable, referral to federal and/or state law enforcement authorities for further action. The Company may, however, in its discretion take alternative disciplinary action against any employee, officer, or board member of the Company found to have violated this section.

Permitted uses and Disclosures of CPNI

1. The company may use CPNI obtained from its customers, either directly or indirectly through its agents.
 - a. To initiate, render, bill and collect for telecommunications services.
 - b. To provide marketing, in compliance with FCC guidelines
 - c. To protect the rights or property of the Company, or to protect users and other carriers from fraudulent or illegal use of or subscription to, such services.
 - d. For provision of information services
 - e. In its provision of maintenance and repair services



5. **Duty to report violation or departure from CPNI Policies and Procedures Manual-** Each employee, officer, or board member of the Company has an affirmative duty to ensure compliance by the Company of the requirements under federal and state law governing the use of CPNI. Any employee, officer, or board member of the Company who knows of or has reason to believe that a violation of or departure from the policies and procedures set forth in this Manual has occurred or will occur shall immediately notify your immediate Manager, Executive Officers, or CEO, or any member of the Board of Directors if the CEO is the subject of the suspected violation.
6. **Notice to Law Enforcement of Unauthorized Disclosure of CPNI-** The Company must notify law enforcement of a breach of its customer's CPNI no later than seven business days after a reasonable determination of a breach by sending electronic notification through a central reporting facility to the United States Secret Service (USSS) and the Federal Bureau of Investigation. The Company will not notify customers or disclose the breach to the public until 7 full days have passed after the notification to the USSS and the FBI except as provided in FCC guidelines. The Company will maintain a record of breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach and the circumstances of the breach. The record must be retained for 2 years.
7. **Employee annual certification/training-**All employees of the Company shall be given a copy of this Manual. All employees are required annually to review the manual and to certify in writing that he or she understands and will adhere to the policies and procedures in this manual.
8. **Annual Certificate of Compliance-** The Company's Officer of Compliance shall annually sign a CPNI compliance certificate stating that the officer has personal knowledge that the Company has established policies and procedures that are adequate to ensure compliance with the FCC's CPNI rules.

Customer Proprietary Network Information (CPNI) Rules and Training

Employee Acknowledgement:

I understand that if Breda Telephone Corp., Prairie Telephone Co., Inc., BTC, Inc., or Westside Independent Telephone Co. determines that I have violated the CPNI rules, I may be subject to disciplinary action up to and including termination of employment. I understand and agree to comply with the CPNI rules in all respects, and I will contact my Department Manager if I have questions regarding these rules.

I acknowledge that I have received CPNI training and received a copy of the manual on Policies and Procedures Governing Customer Proprietary Network Information ("Manual"). I understand the content of the training and the manual. I understand and agree to comply with all aspects of the training and manual, and I will contact my Department Manager if I have questions regarding the training or the manual.

Employee Signature

Training CPNI 2010

1. February 26th, 2010- Staff meeting was held and we had our annual CPNI training. Compliance Officer, Megan Badding handed out our CPNI manuals and trained staff with our company's policies and procedures governing CPNI. Staff was given an acknowledgement that they were trained and fully understands CPNI. These forms were turned back into our HR department and kept on file.

EMPLOYEE LIST - WESTERN IOWA NETWORKS

Signed CPNI Acknowledgement Form for 2010

MEGAN BADDING
KEVIN BATCHER
JOHN BEITER
RYAN BORKOWSKI
HOLLY DARVEAU
CHUCK DEISBECK
TERRY DICKINSON
DOUG EHLERS
BRIAN HAMACHER
MISSY HENDRICKS
JODI IRLBECK
SOPHIA KOCH
DELYNNE KROEGER
JULIE LAMAACK
DAWN LOEW
MIKE LUDWIG
SUE MARTIN
DIANE MILLER
JANE MORLOK
RICK MORRIS
CHRIS NIELAND
BRIAN POTTEBAUM
JENNIFER PUDENZ
MISSY SANDER
GRANT SIEBRECHT
KEVIN SKINNER
JAN STEINKAMP
STEPHANIE THOMSEN
BRUCE TYSOR
STEVE UHLENKAMP
JEANNIE WOOD

Notification to our Customers 2010

1. February 2010- Opt out notifications were sent to all our customers. We put our 800 number and an email address if customers wanted to opt out. If we are notified that a customer would like to opt out we will set an alert in our operating system. When CSR pulls that customer's account up an alert will pop up stating "Do Not Market" Insert attached.

Special Notice of Your Rights Regarding

Customer Account Information

Who uses this information and is it protected?

Only WIN can see or use your Customer Proprietary Network Information (CPNI). It is never released to outside companies. You have the right, and we have the duty under federal law, to protect the confidentiality of this type of information.

What do I need to do?

No action on your part is necessary unless you wish to restrict WIN's use of this information to contact you for the purpose of tailoring our service offerings to better meet your needs. Should you wish to restrict use of your CPNI, please call us at 888-508-2946 or send an e-mail to cpnidata@westianet.com with your request within 30 days of receipt of this notice. Your denial for use of CPNI will remain valid until you tell us otherwise. Keep in mind that restricting CPNI may make you ineligible to receive some information from WIN about new products and services, promotions and packaged offerings.

If I restrict use of my CPNI, will it affect the WIN services I receive?

No, your CPNI decision will not affect the provision of any services to which you subscribe. You will also still receive monthly bill inserts, quarterly newsletters and other publications that are sent to all customers.

This reminder brought to you by:





CPNI Certification Memo

Date: February 14, 2011

To: Megan Badding

RE: Valentine Upgrade to DSL

I hereby certify the attached targeted marketing piece:

<input checked="" type="checkbox"/>	Bill Insert
<input checked="" type="checkbox"/>	Direct Mail Piece
<input type="checkbox"/>	eMail Message

<input checked="" type="checkbox"/>	Bill Message
<input type="checkbox"/>	Suggestive Marketing Message
<input type="checkbox"/>	Other:

from Western Iowa Networks and/or one of its subsidiary companies is in compliance with The Federal Communications Commission (FCC) Order 07-22. No use of customer CPNI was used without the customer's approval.

Megan Badding
Western Iowa Networks CPNI Compliance Officer

Valentine Upgrade DSL insert



Upgrade YOUR INTERNET SERVICE
FOR A *sweet gift* THAT LASTS

WESTERN IOWA NETWORKS
401 N. ADAMS, CARROLL, IA • WWW.WINET.COM

Upgrade YOUR INTERNET SERVICE
FOR A *sweet gift* THAT LASTS

Flowers and chocolates are wonderful, but the enjoyment is short-lived. This year for Valentine's Day, consider a gift you'll both love all year long—an upgrade to high speed Internet service from Western Iowa Networks.

Our high speed Internet speeds you through online activities at rates up to 5 times faster than a typical dial-up connection. Go from website to website at an amazing pace. Download music, video, and software files in a fraction of the time. Whether you're working or playing on the computer, high speed Internet simply makes everything easier.

You'll also enjoy the convenience of an "always on" connection that's ready when you are. Unlike with dial-up, there's no more dialing and no more waiting. Just open your browser or e-mail program and you're instantly online. Plus, with WIN's high speed Internet, you can talk on the phone and be online simultaneously.

Looking for the perfect Valentine gift for your sweetheart? Get FREE chocolates and high-speed Internet service TODAY from Western Iowa Networks. Call 800-508-2946 or visit us online at www.winnet.com.

Western Iowa Networks
Your Company. Local Choice. Local Service.

Source: [illegible]

Valentine Upgrade Post Card



Upgrade YOUR INTERNET SERVICE
FOR A *sweet gift* THAT LASTS

WESTERN IOWA NETWORKS
401 N. ADAMS, CARROLL, IA • WWW.WINET.COM

Upgrade YOUR INTERNET SERVICE
FOR A *sweet gift* THAT LASTS

Flowers and chocolates are wonderful, but the enjoyment is short-lived. This year for Valentine's Day, consider a gift you'll both love all year long—an upgrade to high speed Internet service from Western Iowa Networks.

Our high speed Internet speeds you through online activities at rates up to 5 times faster than a typical dial-up connection. Go from website to website at an amazing pace. Download music, video, and software files in a fraction of the time. Whether you're working or playing on the computer, high speed Internet simply makes everything easier.

You'll also enjoy the convenience of an "always on" connection that's ready when you are. Unlike with dial-up, there's no more dialing and no more waiting. Just open your browser or e-mail program and you're instantly online. Plus, with WIN's high speed Internet, you can talk on the phone and be online simultaneously.

Looking for the perfect Valentine gift for your sweetheart? Get FREE chocolates and high-speed Internet service TODAY from Western Iowa Networks. Call 800-508-2946 or visit us online at www.winnet.com.

Western Iowa Networks
Your Company. Local Choice. Local Service.
401 N. Adams
Carroll, IA 51401

Internet Insert and Post Card List

Advanced Search - Dialup customers

Account	Account Class	Account Number	Account Status	Service	Service Address	Service City State
Alice Huisenga	Residential	00031783-1	Active	Mon2631 2481199	13897 150th St	Arcadia, IA
Alvin & Sue Mueggenberg	Residential	00046377-0	Active	Sammy1 2481126	14401 150th St	Arcadia, IA
Evelyn Wolbermen	Residential	00039915-1	Active	Evelynmw	218 N Division St	Arcadia, IA
John Grote	Residential	00043817-7	Active	Dialup Service	15831 160th St	Arcadia, IA
Ruch Mueggenberg	Residential	00045867-1	Active	Dialup Service	13167 140th St	Arcadia, IA
Gailen Johnson	Residential	00056381-7	Active	Gailen	1449 Redwood Ave	Bagley, IA
Alan & Paula Wittrock	Residential	00042795-8	Active	Apwittz 2481232	307 N 3rd St	Breda, IA
Brandon Von Glan	Residential	00027943-6	Active	Bvonglan	11489 120th St	Breda, IA
Charles Hundling	Residential	00005419-5	Active	CHundling	12307 Birch Ave	Breda, IA
Chris Brotherson	Residential	00046158-5	Active	Cutler	1210 370th St	Breda, IA
Chris Musselman	Residential	00048936-1	Active	Dialup Service	306 Bruning St	Breda, IA
Dale & Marilyn Snyder	Residential	00050728-4	Active	Dmsnyder 2481281	103 Parkview Circle Dr	Breda, IA
Devey L Kock	Residential	00006735-0	Active	Unibeef	1211 370th St	Breda, IA
David & Mary Wittry	Residential	00010027-2	Active	Widam 2481258	16274 140th St	Breda, IA
Dennis & Angie Ball	Residential	00059691-8	Active	Adball	502 Main St	Breda, IA
Don & Joann Gerken	Residential	00018730-0	Active	Dialup Service	12498 130th St	Breda, IA
Eugene & Joyce Snyder	Residential	00024362-7	Active	Snyder2 2481010	15567 110th St	Breda, IA
Jeff J & Nancy Pudenz	Residential	00026922-9	Active	Njpart 2481013	103 Artz St	Breda, IA
Joe Headley	Residential	00048974-7	Active	Jheadley	10132 130th St	Breda, IA
Kenneth Snyder	Residential	00044583-6	Active	Kasnyder 2481257	407 Main St	Breda, IA
Kirk & Bev Finley	Residential	00060713-8	Active	Dialup Service	3954 Taylor Ave	Breda, IA
Lynn Haberl	Residential	00010281-0	Active	Dialup Service	3334 390th St	Breda, IA
Maunice Julich	Residential	00043563-0	Active	Dialup Service	16268 Hawthorne Ave	Breda, IA
Richard Brotherson	Residential	00033615-2	Active	Rbrother	3666 C Ave	Breda, IA
Robert Schettler	Residential	00020263-9	Active	Brschettler	202 Bruning St	Breda, IA
Roger Ludwig	Residential	00018216-7	Active	Gotawin 2481231	405 Artz St	Breda, IA
Roland Snyder	Residential	00045607-7	Active	Dialup Service	13231 Concord Ave	Breda, IA
Scott & Donna Wiederin	Residential	00040235-7	Active	Swiederin	18204 140th St	Breda, IA
Sheri Dix	Residential	00038695-8	Active	Sdix	208 Maple St	Breda, IA
Shirley Kerber	Residential	00015912-4	Active	Kerberkjam	18395 130th St	Breda, IA
Steve & JoAnn Escheld	Residential	00030251-6	Active	Sjesch 2481170	15689 140th St	Breda, IA
Tim & Kathleen Snyder	Residential	00022570-5	Active	Ksnyd	11042 Hawthorne Ave	Breda, IA
Tom & Norma Westling	Residential	00009515-0	Active	Thwess 2481309	402 Main St	Breda, IA
Wayne & Connie Juhl	Residential	00031273-4	Active	Conwayju 2481025	402 Bruning St	Breda, IA
Zacharina Campbell	Residential	00027431-7	Active	Zacharina	404 Maple St	Breda, IA
Alan & Cynthia Kraus	Residential	00029739-2	Active	Alkraus	21556 130th St	Carroll, IA
Alan A & Diane K Brincks	Residential	00051506-8	Active	Brinaily	13904 Jewel Ave	Carroll, IA
Allan D & Sherree Nagl	Residential	00017966-2	Active	Farnas	21438 Jade Ave	Carroll, IA
Ario Buelhel	Residential	00006994-3	Active	Dialup Service	22016 Olympic Ave	Carroll, IA
Beth Rowles	Residential	00019252-3	Active	Rowlesc 1081193	19112 Hawthorne Ave	Carroll, IA
Bill & Connie Foval	Residential	00030255-0	Active	Dialup Service	22892 Jade Ave	Carroll, IA
Bob & Mary Pat Vennier	Residential	00022325-8	Active	Dialup Service	19053 Ivy Ave	Carroll, IA